



# CORNERSTONE

Engineering Group, LLC

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VIA E-MAIL AND US MAIL

December 2, 2013

Mr. Jonathan Gorin  
Remedial Project Manager  
United States Environmental Protection Agency, Region II  
290 Broadway  
19<sup>th</sup> Floor  
New York, New York 10007-1866

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Subject: Monthly Progress Report for November 2013  
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule has been provided as an attachment to past monthly progress reports. However, as indicated in the progress report for August 2013, with the USEPA's approval in August of the *Remedial Investigation Report* (RIR), *Human Health Risk Assessment* (HHRA), *Baseline Ecological Risk Assessment* (BERA), and *Feasibility Study* (FS), the work requirements of the Statement of Work (SOW) in the Consent Order have been met. Therefore, no specific future actions have been defined at this point for which a schedule can be shown. As such, a schedule is not included with this progress report, although if specific future actions consistent with the Consent Order are defined, a schedule will be added to the progress report.

## 1. Previous Actions in Compliance with the Order

A. The following actions were taken to comply with the Order during the previous month:

- Since the specific work requirements of the Consent Order have been completed and approved, the only continuing work has been ongoing coordination with the USEPA as requested by the Agency in support of issuing the final Record of Decision (ROD). During this reporting period, IES continued to respond to USEPA's requests for

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clarification of several items for its use in preparation of the ROD and responsiveness summary.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated November 4, 2013.

C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

## **2. Future Actions, Data, and Plans**

A. As previously noted, with the USEPA approval of the RIR, HHRA, BERA, and FS, the RI/FS work requirements of the Consent Order have been met, and therefore, no specific future actions have been defined at this point. To the extent that the Record of Decision (ROD) has not yet been issued, future work may be performed as relates to comments received from the public participation process and the final ROD.

B. Other information related to the progress of work:

- None during this reporting period.

## **3. Project Schedule**

A. As noted above, there are not any work items for which a schedule can be defined, and therefore, a schedule is not included with this progress report. If future work items consistent with the Consent Order are defined in the future, an updated schedule will be prepared and included with the progress report.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- The work required by the Consent Order is completed.

C. Description of efforts made to mitigate these delays or anticipated delays:

- The work required by the Consent Order is completed.

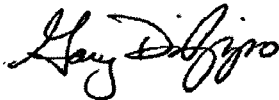
**4. Funding Mechanism**

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

**CORNERSTONE ENGINEERING GROUP, LLC**



Gary J. DiPippo, P.E.  
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
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